

EXHIBIT 18

1 STATE OF ILLINOIS)
) SS:
2 COUNTY OF C O O K)

3 IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT - CRIMINAL DIVISION
4 SECOND DISTRICT

5 THE PEOPLE OF THE STATE)
OF ILLINOIS,)
6)
Plaintiff,)
7)
vs.) No. 09 C2 20073
8)
PRABHJOT UPPAL,)
9)
Defendant.)

REPORT OF PROCEEDINGS had at the hearing
in the above-entitled cause before the HONORABLE
GARRITT HOWARD, Judge of said court, on the 18th
day of October, 2013.

15 APPEARANCES:

16 HONORABLE ANITA M. ALVAREZ,
State's Attorney of Cook County, by:
17 MS. MEGAN MEENAN,
Assistant State's Attorney,
18 appeared on behalf of the People;

19 MR. JASON WALLACE and MR. DANIEL FLOREY,
appeared on behalf of the Defendant.

Probation Officer: Bob Hilger

23 SUZANNE M. O'DRISCOLL, CSR
Official Court Reporter
24 CSR No. 084-002659

1 THE CLERK: Prabhjot Uppal.

2 THE COURT: Good morning, counsel.

3 MR. WALLACE: Good morning, your Honor. For
4 the record, Jason Wallace stepping up for Stuart
5 Goldberg and Sam Adam, Jr., counsel for
6 Miss Uppal, who is present before your Honor.

7 Your Honor, this case is actually
8 following her case before Judge Walsh. So her
9 next court date in that case is January --

10 THE COURT: Shah, will you find me the half
11 sheet on this?

12 PROBATION OFFICER: It's up January 6th.

13 MR. WALLACE: Yes. So your Honor, we can do
14 January 8th, two days later.

15 THE COURT: Well, are you just filing this
16 motion today? Is there a motion being filed
17 today?

18 THE DEFENDANT: There was supposed to be a
19 motion filed.

20 THE COURT: I've got a motion to admit newly
21 discovered evidence of actual innocence and to
22 authorize subpoena power and to grant leave to
23 file amended petition for post-conviction relief.

24 MR. WALSH: Yes. I believe Attorney Florey

1 filed that last week.

2 THE COURT: Well, I haven't had a chance to
3 review it yet. I will have to look at it if you
4 want me to consider the motion.

5 MR. WALLACE: Well, he's not here and he did
6 file it and I didn't see it or anything like that.

7 THE COURT: He's asking for subpoena power.

8 MR. WALLACE: Yes, it is.

9 THE COURT: Well, I don't know how to answer
10 that unless I review the materials.

11 MR. WALLACE: Of course.

12 THE COURT: Do you want me to pass it for that
13 purpose or address that issue on a subsequent
14 date?

15 MR. WALSH: Let's address it on a
16 subsequent --

17 PROBATION OFFICER: Your Honor, there is also
18 another issue brought to light. The Defendant
19 indicates to me she has like a blank permission to
20 keep coming back and forth to the State of
21 California. I don't know if there was ever a
22 specific order that was ever written. She still
23 is on felony probation. She has a new probation
24 officer assigned to her now but I don't -- she

1 indicates to me that she is flying back to
2 California for three weeks.

3 THE DEFENDANT: No, I did not say that.

4 THE COURT: I'm going to pass the case and
5 review the materials. All right?

6 MR. WALLACE: Okay.

7 THE COURT: Okay. You can talk to her about
8 her travel plans and whether or not they're
9 authorized or not.

10 (The matter was passed and
11 recalled, after which the following
12 proceedings were had:)

13 THE CLERK: Prabhjot Uppal.

14 MR. FLOREY: Good morning, your Honor.

15 THE COURT: Good morning, counsel.

16 MR. FLOREY: Judge, for the record, Daniel
17 Florey, F-l-o-r-e-y. I am the attorney of record
18 solely on the PC matter.

19 Judge, I do apologize for not being
20 here. I filed an amended motion. The only
21 change, Judge, and I told the State I was going to
22 do this, the cell phone was changed to a land
23 line.

24 I had a misstatement. In my first page,

1 the dates were off on the notice of filing, so I
2 corrected those two technical matters.

3 I don't know if your Honor wanted to
4 argue it today or what your Honor's preference
5 was. Whatever you prefer we're willing to accede
6 to the Court's wishes.

7 THE COURT: Well, I show it's up for the
8 State's Motion to Dismiss.

9 MS. MEENAN: Yes, your Honor. On July 26th,
10 counsel -- petitioner's counsel struck a footnote
11 and then stated that they were standing on the PC
12 and at that point it was put over for my Motion to
13 Dismiss as of July 26.

14 I was in the middle of drafting my
15 Motion to Dismiss last week when I was notified by
16 counsel that they were filing either an amended
17 motion or requesting the Court for leave to file
18 additional evidence of actual innocence or
19 requesting the Court to file a subpoena. In light
20 of that information, I stopped writing to -- in
21 case it was going to go somewhere else at that
22 point since it would be a waste of my time,
23 honestly, if something else came in that I would
24 have to address.

1 MR. FLOREY: We did speak.

2 THE COURT: What is it you're seeking to
3 subpoena?

4 MR. FLOREY: Judge, that would be phone
5 records.

6 THE COURT: Phone records relating to?

7 MR. FLOREY: Relating to the time of this
8 alleged incident going all the way back to --

9 THE COURT: Wasn't this done before?

10 MR. FLOREY: No. And that's what is -- now,
11 Judge, if you remember, I had a hard time getting
12 the trial file on this and in my file, there is no
13 subpoenas, and the State has tendered discovery
14 that I have in the file. I don't see any phone
15 records subpoenaed and I don't think I'm going to
16 be able to get them this late but my client asked
17 me to at least try.

18 And here is the thing about the phone,
19 Judge. It was just discovered at the end of
20 September when my client was going through some
21 personal belongings in storage --

22 THE COURT: I read your amended motion.

23 MR. FLOREY: So --

24 THE COURT: That doesn't really prove

1 anything.

2 MR. FLOREY: Well.

3 THE COURT: The phone records would.

4 MR. FLOREY: I know.

5 THE COURT: Well, you can subpoena the phone
6 records. I'm surprised the State, when they
7 initially worked up the case, of course, you
8 didn't have the case initially, whoever worked up
9 the case initially would not have gotten these
10 records since it was part and parcel of the
11 offense.

12 MS. MEENAN: Your Honor, as I stand here
13 today, I don't know. I was not able to get our
14 trial file. Our warehouse did not locate our
15 trial file.

16 THE COURT: Well, get your file. I would be
17 surprised that they are not in there.

18 MR. FLOREY: Judge, I don't want to overstate
19 it to you. There is one phone record in there but
20 it's not phone records that we think would be case
21 determinative.

22 If my recollection is accurate, there
23 was one page of a phone record but not from my
24 client's phone and not from the alleged

1 complaining witness' phone.

2 THE COURT: I can't imagine attorneys working
3 on this case at the time would not have gotten
4 those records.

5 MR. FLOREY: It's possible I just don't have
6 it in the file.

7 THE COURT: Could be. Well, we will give it a
8 date, issue your subpoena, check your file. They
9 should be in there.

10 MR. FLOREY: Okay.

11 MS. MEENAN: We have not been able to locate
12 our file.

13 THE COURT: Well, it's got to be somewhere.

14 MS. MEENAN: Your Honor, is this, just to be
15 clear since I was just handed the motion today for
16 the subpoena, this is for a subpoena for land
17 records of the petitioner; is that right?

18 THE COURT: The Defendant's phone.

19 MR. FLOREY: No. And of the doctor.

20 MS. MEENAN: Can I have time to file a written
21 response to that then, Judge?

22 THE COURT: You can.

23 MS. MEENAN: Without a subpoena going out for
24 the complaining witness' phone records?

1 THE COURT: You're entitled to respond to it,
2 if you wish to.

3 MS. MEENAN: Thank you.

4 THE COURT: You can subpoena your client's
5 phone records though. You don't need the State's
6 agreement for that.

7 MR. FLOREY: Right. What about the phone
8 itself?

9 THE COURT: What about it?

10 MR. FLOREY: That was part of the motion to
11 admit that into evidence.

12 THE COURT: Well, let's get the records first.
13 One step at a time.

14 MR. FLOREY: Okay.

15 THE COURT: If the phone records are
16 available, that's going to resolve that issue.

17 MR. FLOREY: Are we looking at a Friday date?

18 MS. MEENAN: Yes, please.

19 MR. FLOREY: What would you prefer, Judge?

20 THE COURT: How much time are you going to
21 need do you think, probably about six weeks to
22 make sure you get them?

23 MR. FLOREY: Yes.

24 THE COURT: So sometime late November.

1 MR. FLOREY: Judge, could we do December 6th?

2 I'm actually on vacation around Thanksgiving.

3 THE COURT: All right. By agreement

4 December 6th.

5 MR. FLOREY: Thank you, Judge. And the

6 pending violation of probation is just entered and

7 continued?

8 THE COURT: Correct.

9 MR. FLOREY: Thank you, your Honor.

10 (Whereupon, the above-entitled cause

11 was continued to 12-6-13.)

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EXHIBIT 19



UNIVERSITY FACULTY BYLAWS

**Ratified by the University Senate 05/11/15
Approved by Board of Trustees 05/14/15**

- For a faculty member in their first year of service, notice must be given at least four months in advance of the expiration of the appointment.
- For a faculty member in with 12-19 months of service, notice must be given at least six months in advance of the expiration of the appointment.
- For a faculty member with 20 or more months of service, a twelve-month notice of non-renewal must be given. If notice of non-renewal is given at least twelve months prior to the expiration of the appointment, the appointment will end on its defined expiration date. Alternatively, notice of non-renewal may be given any time during the final year of the appointment with the actual date of separation occurring no earlier than twelve months after notification of non-renewal.

Section 5:2-02 Terminations

As it pertains to faculty appointments for individuals who are *not* employed by the University, the University may terminate a faculty appointment prematurely upon the determination by the Dean of the relevant school (with the recommendation of the relevant department chair), in his/her sole discretion, that such termination (including its premature timing) would be in the best interests of the University. No formal notice of hearing procedures is required.

The remainder of this section pertains to faculty appointments for individuals who are employed by the University.

The only circumstances under which the University may terminate an employed faculty member prematurely, whether tenured or not, are where there is a determination, consistent with process described in this Section, of just cause, financial exigency, or elimination of a program. As part of the termination, a tenured faculty member shall forfeit tenure.

I. Just Cause: Terminations for just cause may occur upon the determination that the faculty member has exhibited behavior such as major violations of the University's Code of Conduct, willful material concealment or misrepresentation during the application for employment process, gross incompetence in the performance of duties, substantial neglect of duty, flagrant unprofessional or abusive conduct towards a member of the University community or within the University environment, willful violation of policy resulting in a significant loss of resources or risk of harm to a person, commission of a crime against the University or against any member of the University community, or commission of a felony.

Procedures:

The Dean of the school or college shall review the information available and, if

EXHIBIT 20



Education ▾

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Last of 3 candidates for med school dean position visits WSU



Originally published August 31, 2015 at 12:56 pm Updated August 31, 2015 at 3:16 pm

Dr. John Tomkowiak is the dean of the Chicago Medical School at Rosalind Franklin University of Medicine and Science.

By [The Associated Press](#)

SPOKANE, Wash. — The last of three candidates to become founding dean of the new Washington State University College of Medicine is visiting the Spokane campus.

Dr. John Tomkowiak is the dean of the Chicago Medical School at Rosalind Franklin University of Medicine and Science. He visited WSU Spokane on Monday to meet with faculty, administrators and the public.

The other finalists are Dr. David Gozal of the University of Chicago, and Dr. Dawn DeWitt of the University of British Columbia.

CONTINUE READING BELOW

The new dean will serve as head of the new WSU College of Medicine, which was created during the 2015 legislative session. The hiring of the dean is a major step toward gaining national accreditation for the school, which hopes to begin teaching its first class of medical students in 2017.

CONTINUE READING BELOW

CONTINUE READING BELOW

EXHIBIT 21

EEOC Form 161 (2/08)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Prabhjot Uppal**
175 East Delaware, #5307
Chicago, IL 60611

From: **Chicago District Office**
500 West Madison St
Suite 2000
Chicago, IL 60661

CERTIFIED MAIL 7000 1670 0012 6742 2948

☐

On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

440-2006-06875

Susan L. Smith,
Investigator

(312) 353-0897

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

☐

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.

☐

Your allegations did not involve a disability as defined by the Americans With Disabilities Act.

☐

The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.

☐

Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge

☒

The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.

☐

The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.

☐

Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

Enclosures(s)

On behalf of the Commission

John P. Rowe
John P. Rowe,
District Director

8/14/09

(Date Mailed)

cc: **ADVOCATE LUTHERAN GENERAL HOSPITAL**

EXHIBIT 22

RE: OCR complaint against Rosalind Franklin University

From: **Strubel, Aleeza** (Aleeza.Strubel@ed.gov)
Sent: Fri 12/20/13 3:13 PM
To: 'Jody Uppal' (jodyuppal@hotmail.com)
Cc: Goodemote, John (John.Goodemote@ed.gov)

Thank you for the response. We are only investigating the issue of the “email bombs” and not any possible hacking of your email account. That would raise new issues not covered by our pending complaint.

As for the 9/10/13 “email bomb,” can you please provide me with a copy of the email. Also, please confirm whether this was the last “email bomb” that you received from the University.

Sincerely,

Aleeza Strubel

Aleeza Strubel

U.S. Department of Education, Office for Civil Rights

From: Jody Uppal [mailto:jodyuppal@hotmail.com]
Sent: Friday, December 20, 2013 3:10 PM
To: Strubel, Aleeza
Cc: Goodemote, John
Subject: Re: OCR complaint against Rosalind Franklin University

Hello Ms Strubel

Thank you for following up. I was email bombed again and hacked on 9/10/13.

[Print](#)

[Close](#)

Yahoo! Sign-in Alert

From: **Yahoo!** (noreply@yahoo-inc.com)

Sent: Tue 9/10/13 11:47 AM

To: prabhjot_uppal@hotmail.com



Hi prabhjot,

We noticed a login to your Yahoo! account (prabhjotuppal) from an unrecognized device on Tue, Sep 10, 2013 7:47 PM EEST from Belarus.

Was this you? If so, please disregard the rest of this email.

If this wasn't you, please follow the links below to keep your Yahoo! account safe:

- [Set up second sign-in verification](#)
- [Change your password](#)
- [Update your account password reset info](#)

To learn how alerts like this one help you to protect your account, visit our [Help Center](#).

Thanks,
Yahoo! Account Services

Please do not reply to this message. Mail sent to this address cannot be answered.

Subject: Yahoo! Sign-in Alert

From: Yahoo! (noreply@yahoo-inc.com)

To: prabhjotuppal@yahoo.com;

Date: Tuesday, September 10, 2013 9:47 AM



Hi prabhjot,

We noticed a login to your Yahoo! account (prabhjotuppal) from an unrecognized device on Tue, Sep 10, 2013 7:47 PM EEST from Belarus.

Was this you? If so, please disregard the rest of this email.

If this wasn't you, please follow the links below to keep your Yahoo! account safe:

- [Set up second sign-in verification](#)
- [Change your password](#)
- [Update your account password reset info](#)

To learn how alerts like this one help you to protect your account, visit our [Help Center](#).

Thanks,
Yahoo! Account Services

Please do not reply to this message. Mail sent to this address cannot be answered.

[Print](#)

[Close](#)

good morning

From: **prabhjot uppal** (prabhjotuppal@yahoo.com)

Sent: Tue 9/10/13 11:50 AM

To: prabhjot uppal (prabhjot_uppal@hotmail.com); Rimpj Sidhu (sidhurimpj@yahoo.com); altiero (altiero@tulane.edu); dominiquebridges37 (dominiquebridges37@yahoo.com); jodyuppal (jodyuppal@hotmail.com); rabbi (rabbi@asbi.org); gobinduppal (gobinduppal@yahoo.com)

[http://microinsight.com.cn/wp-content/plugins/customize-admin/likeit.php?
zjikrydwzo962xbfpd.htm](http://microinsight.com.cn/wp-content/plugins/customize-admin/likeit.php?zjikrydwzo962xbfpd.htm)

[Print](#)

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Reset your Yahoo! password

From: **Yahoo! Member Services** (yahoo-account-services-us@cc.yahoo-inc.com)
Sent: Tue 9/10/13 11:53 AM
To: prabhjot_uppal@hotmail.com

230215 is your verification code for prabhjotuppal@yahoo.com

This request was made on September 10, 2013 at 09:53am PDT.

Regards,
Yahoo! Member Services

Please do not reply to this message. Mail sent to this address cannot be answered.

[Print](#)

[Close](#)

Your Yahoo! password was changed

From: **Yahoo! Member Services** (yahoo-account-services-us@cc.yahoo-inc.com)

Sent: Tue 9/10/13 11:54 AM

To: prabhjot_uppal@hotmail.com

Your Yahoo! ID is: prabhjotuppal
(ID partially hidden for your privacy)

The password for your Yahoo! ID was recently changed. You don't need to do anything, this message is simply a notification to protect the security of your account. Your new password will be activated in a few seconds. If it does not work on your first try, please try again later.

- Didn't change your password?

1. Someone changed your password on September 10, 2013 at 09:54am PDT. Please sign in to your Yahoo! account to confirm you still have access after the change.
2. Reset your password (<https://edit.yahoo.com/forgot?intl=us&partner=>) from any sign-in screen by clicking the forgotten password link.
3. Visit the Yahoo! Security Center (<http://security.yahoo.com>) to learn how to protect yourself from phishing attacks.

Regards,
Yahoo! Member Services

Please do not reply to this message. Mail sent to this address cannot be answered.

Subject: Your Yahoo! password was changed

From: Yahoo! Member Services (yahoo-account-services-us@cc.yahoo-inc.com)

To: prabhjotuppal@yahoo.com;

Date: Tuesday, September 10, 2013 9:54 AM

Your Yahoo! ID is: prabhjotuppal

The password for your Yahoo! ID was recently changed. You don't need to do anything, this message is simply a notification to protect the security of your account. Your new password will be activated in a few seconds. If it does not work on your first try, please try again later.

- Didn't change your password?

1. Someone changed your password on September 10, 2013 at 09:54am PDT. Please sign in to your Yahoo! account to confirm you still have access after the change.
2. Reset your password (<https://edit.yahoo.com/forgot?intl=us&partner=>) from any sign-in screen by clicking the forgotten password link.
3. Visit the Yahoo! Security Center (<http://security.yahoo.com>) to learn how to protect yourself from phishing attacks.

Regards,
Yahoo! Member Services

Please do not reply to this message. Mail sent to this address cannot be answered.

Subject: Password Changed

From: Yahoo! Member Services (mail-passwords@cc.yahoo-inc.com)

To: prabhjotuppal@yahoo.com;

Date: Friday, September 13, 2013 2:27 PM

Your Yahoo! ID is: prabhjotuppal

Your password for this account has recently been changed. You don't need to do anything, this message is simply a notification to protect the security of your account.

Please note: your new password may take awhile to activate. If it doesn't work on your first try, please try it again later

DO NOT REPLY TO THIS MESSAGE. For further help or to contact support, please see <http://help.yahoo.com/help/edit/>

You can always change your password by doing the following:

1. Sign in to any Yahoo! service
2. Click on any "My Account" link
3. Choose "Change Password"

If you cannot find a "My Account" link, you can sign in to My Yahoo! (<http://my.yahoo.com>) and you'll find it in the upper left corner

You can now use this mobile number to recover your account in case you ever forget your password. To ensure that your account information remains accurate and secure we notify you whenever this information changes.

If the changes described above are accurate, no further action is needed. If anything doesn't look right, follow the link below to make changes:

https://edit.yahoo.com/channel/manage?ar=2&ea=0PV1GkYVwAu2uZ46LJqda838sqWXKruzv16LUVd8ayuYb9Fzft_xrUDcUcNQiLLeDddU0k1alVnfw-&intl=us&done=https%3A%2F%2Fedit.yahoo.com%3F

Please do not reply to this message. Mail sent to this address cannot be answered.

Subject: Your Yahoo! Account

From: Yahoo! (no-reply@yahoo-inc.com)

To: prabhjotuppal@yahoo.com;

Date: Tuesday, November 5, 2013 3:27 PM

Dear prabhjotuppal,

At Yahoo!, your account safety is our top priority.

Recently, we have detected some unusual activity on your account and as a result, we've temporarily locked it for your protection. You may unlock your account immediately by logging in on a PC. If you have additional questions, please visit us at http://io.help.yahoo.com/contact/index?y=PROD_ACCT&locale=en_US&page=contact&srcContact=acct_care#voice-form to get the help you need.

Sincerely,
Your Yahoo! Customer Experience Team